



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Water Resources
Knoxville Environmental Field Office
3711 Middlebrook Pike
Knoxville, Tennessee 37921

December 22, 2015

Mr. Charles Higginbotham
President, Clearfork Utility District
P.O. Box 63
Clairfield, Tennessee 37715

RE: Compliance Evaluation Inspection
Clearfork Utility District Water Treatment Plant
NPDES Permit # TN0060852, Claiborne County

Dear Mr. Higginbotham:

On November 30, 2015, Division of Water Resources personnel conducted a Compliance Evaluation Inspection regarding the filter backwash discharge at Clearfork Utility District's Water Treatment Plant. Clearfork Utility District's (UD) approval to discharge filter backwash water falls under the National Pollution Discharge Elimination System (NPDES) permit # TN0060852. The Division would like to thank Mr. Roy Price for his cooperation on the day of the inspection and for providing information on Clearfork UD's filter backwash discharge process.

Permit

A copy of the water system's NPDES permit was on file and available for review. The permit expired on June 30, 2015 and Clearfork UD will need to submit a Notice of Intent within 30 days to renew their coverage.

Clearfork UD is required by their discharge permit to grab sample once a month for Total Suspended Solids, pH, Iron, Settable Solids and total chlorine residual during times of discharge to an unnamed tributary to Clear Fork. Instantaneous flows are also required to be reported. These flows are currently unmetered.

Records / Reports

Division staff reviewed the operational reports from June 2013 to December 2014. During this time period, Clearfork UD reported “No Discharge” on the Discharge Monitoring Reports (DMRs). Due to confusion on discharging from the water treatment plant, Clearfork UD stopped submitting DMRs in 2015. At this time, Clearfork UD will be required to continue submitting DMRs monthly and documenting water quality monthly if a discharge occurs.

Clearfork UD consistently submitted the monthly DMRs by the 15th of the following month for the June 2013 to December 2014 compliance period. Please continue to submit copies of the DMR to both the Division’s central office and field office for review.

Effluent / Receiving Waters

Backwash water from Clearfork UD’s Water Treatment Plant filters is sent to a 15 foot deep concrete basin where the water is allowed to settle before the supernatant is discharged to a holding pond located on the water treatment plant property. Since the only contributor to the holding pond is surface run-off and the discharge from the concrete basin, the pond may be considered a wet weather conveyance as it appears to only over flow during wet weather events.

During the on-site inspection, the concrete basin and holding pond appeared to be in good condition and fit for their intended purpose. Division staff did observe flow from the holding pond leaving the water treatment plant property, but was unable to observe the flow up close.

At the time of the inspection, Division staff did not observe a posted sign identifying the discharge. The Division requests that a sign be posted on the fence where overflow from the holding pond leaves the water treatment plant property. The sign will need to be posted within 30 days. Sign requirements and information can be found on page 20 of the General NPDES Permit for Discharges of Filter Backwash and Sedimentation Basin Washwater from Water Treatment Plants.

Sludge Handling

At the time of the on-site inspection, Clearfork UD has not needed to remove sludge from the concrete basin or holding pond for several years. In discussing the issue, the water system is likely to haul any water treatment by-product to a landfill for disposal due to the iron content present.

Laboratory and Self-Monitoring Program

Clearfork UD has not been required to conduct laboratory analysis on the backwash water due to the system reporting “No Discharge”. Should discharges occur that would require water analysis, the water system will need to meet the requirements of the Standard Method Update Rule for some of the parameters that may be analyzed on-site. Information on complying with the Standard Method Update Rule is included.

Conclusion

Clearfork UD appears to be providing adequate treatment of the filter backwash water prior to discharge. Reporting issues need to be corrected and water quality discharge documented. The Division would once again like to thank Clearfork UD for their cooperation during the on-site inspection. If you have any further questions or comments regarding the Compliance Evaluation Inspection, please do not hesitate to contact me at (865) 594-5564.

Sincerely,



Erich Webber
Division of Water Resources
Knoxville Environmental Field Office

cc: Mr. Roy Price, Manager, Clearfork Utility District
File



TDEC - Division of Water Resources
Knoxville Field Office

ICIS NPDES Facilities Inspection Report

Facility Data

NPDES ID:	TN0060852	Facility Site Name	Clearfork Utility District		
		Address	115 Rogerston Road, Clairfield, TN 37715		
Permit Eff. Date:	Jun 26, 2013	Permit Exp Date:	Jun 30, 2015	SIC Code:	4941

Compliance Monitoring Information

Compliance Monitoring Activity Name	Compliance Evaluation (non-sampling) (CEI)				
	* If Bio Monitoring is selected above, select the method used:				
Compliance Monitoring Activity					

Compliance Monitoring Dates/Times

Entry Date/Time (mm/dd/yyyy hh:mm):	11/30/2015 10:00	Exit Date/Time (mm/dd/yyyy hh:mm):	11/30/2015 15:30
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Facility Representatives

Mr. Roy Price, Manager, (423) 784-4322	Mr. Charles Higginbotham, President, (423) 784-7039
On-Site Representative(s) Title, Phone Number	Responsible Official(s), Title, Phone Number

Statute and Section Information

Federal Statute:	CWA - Clean Water Act	State Statute:	Tennessee Water Quality Control Act
Programs:	NPDES- Base Program (Limits, Reporting, & Schedule)		

Compliance Monitoring Reason:					
Compliance Monitoring Agency Type:		Agency Name:	TDEC - DWR		
Did EPA assist/ Inspection?	No	Time Physically conducting activity: Days:	2	Hours:	0
Inspection Type:	State	Compliance Monitoring Action Outcome:	Under Review		
Lead Agency:	State	Compliance Monitoring Rating Code:	Marginal		
If Joint Inspection, what was the purpose of the other party?					

Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input type="checkbox"/> Self - Compliance Program	<input type="checkbox"/> Pretreatment
<input checked="" type="checkbox"/> Records / Records	<input type="checkbox"/> Compliance Schedule	<input type="checkbox"/> Pollution Prevention
<input type="checkbox"/> Facility Site Review	<input checked="" type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water
<input checked="" type="checkbox"/> Effluent / Receiving Waters	<input type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow
<input type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Sludge Handling / Disposal	<input type="checkbox"/> Sanitary Sewer Overflow

Compliance Monitoring Summary

Ceased to submit DMRs in 2015, allowed permit to expire, need to implement Standard Method Update Rule

EPA and State Representatives

Erich Webber	TDEC/KEFO/ (865) 594-5564	Dec 21, 2015
Inspector's Signature	Agency / Office / Phone	Date
Robert Ramsey	TDEC/KEFO/ (865) 594-5564	Dec 21, 2015
Manager's Signature	Agency / Office / Phone	Date

(Note: This form can only be printed to an XPS document, then saved for later use.)